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County of Alameda and Alameda County Deputy
Sheriff Joshua Mayfield
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 JOSEPH P. CUVIELLO and DENIZ
13 BOLBOL, individually,

14 Plaintiffs,

15 v.

16 ROWELL RANCH RODEO, INC.;
17 HAYWARD AREA RECREATION AND
PARK DISTRICT; HAYWARD AREA
18 RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
19 KEVIN HART; ALAMEDA COUNTY
SHERIFF'S OFFICE; ALAMEDA COUNTY
20 DEPUTY SHERIFF JOSHUA MAYFIELD;
and DOES 1 and 2, in their individual and
21 official capacities, jointly and severally,

22 Defendants.
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Case No. 3:23-cv-01652-VC

**DEFENDANT COUNTY OF
ALAMEDA'S UPDATED RESPONSE
TO PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS,
SETS ONE AND TWO**

28 DEFENDANT COUNTY OF ALAMEDA'S UPDATED
RESPONSE TO PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS, SETS ONE AND
TWO

3:23-CV-01652-VC

1 PROPOUNDING PARTY: PLAINTIFFS JOSEPH P. CUVIELLO and DENIZ BOLBOL

2 RESPONDING PARTY: DEFENDANT COUNTY OF ALAMEDA

3 SET NO.: ONE AND TWO

4 Defendant COUNTY OF ALAMEDA (“Responding Party”) hereby makes the following
5 updated responses to Plaintiffs JOSEPH P. CUVIELLO and DENIZ BOLBOL (“Plaintiffs”)
6 Request for Production of Documents, Sets One and Two.

7 **UPDATED RESPONSES TO REQUESTS FOR PRODUCTION**

8 **REQUEST FOR PRODUCTION NO. 1:**

9 Produce all documents used or viewed in the preparation of your responses to Plaintiffs’
10 Interrogatories, Set One.

11 **RESPONSE TO REQUEST NO. 1:**

12 Responding Party objects that this request is overbroad and unduly burdensome, and is
13 vague and ambiguous as to the terms “used” and “viewed.” Responding Party objects to this
14 request to the extent it calls for information or documents protected by the attorney-client
15 privilege and work product doctrine.

16 **REQUEST FOR PRODUCTION NO. 2:**

17 Produce all documents related to any training YOU or your employees, representatives,
18 contractors, volunteers, or other persons engaged, employed, or associated with you received on
19 FIRST AMENDMENT RIGHTS within the two years preceding the 2022 events, including the
20 dates on which those trainings occurred and dates on which any materials were distributed.

21 **RESPONSE TO REQUEST NO. 2:**

22 Responding Party objects that the term “associated” is vague and ambiguous. Responding
23 Party objects that this request fails to describe the requested documents with reasonable
24 particularity as required by Rule 34(b)(1)(A). Responding Party objects that this request is
25 overbroad and unduly burdensome to the extent it requires the County of Alameda to undertake a
26 County-wide search for responsive information and documents and is outside the scope of

discovery permitted by Rule 26(b)(1) to the extent it is not limited to the Alameda County Sheriff's Office and includes anyone "associated" with the Sheriff's Office. Pursuant to an agreement with plaintiffs' counsel, Responding Party accordingly limits its response to Alameda County Sheriff's Office. Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

The Alameda County Sheriff's Office provides its recruits with training and instruction in First Amendment issues as part of their Academy program. Training in First Amendment issues is also provided to deputies and sergeants during their one day annual training in October of each year, and members of the Crowd Management Team also receive training that may at times address free speech issues.

Responding Party identifies the following previously produced documents responsive to this request from the Academy program, Bates-stamped AlamedaCounty_Bolbol_000001-AlamedaCounty_Bolbol_000277.

In addition, Responding Party identifies and produces the following documents:

- Training Bulletin No. 13-13, "Peaceful Picketing During Labor Disputes," dated June 19, 2013; and Training Bulletin No. 15-10, "Filing of Law Enforcement by the Public," dated June 26, 2015. These two documents are Bates-stamped AlamedaCounty_Bolbol_000316 through AlamedaCounty_Bolbol_000320.

- A set of Powerpoint slides used by Det. Patrick Smyth of the Alameda County Sheriff's Office for his course for Learning Domain 2, The Criminal Justice System, Bates-stamped AlamedaCounty_Bolbol_000321 through AlamedaCounty_Bolbol_000341.

REQUEST FOR PRODUCTION NO. 3:

Produce all documents related to any complaints, received before or after the 2022 events, about any of your employees who were present at the 2022 events, including any disciplinary

1 action taken with respect to said employees, whether such action was taken in response to a
2 complaint.

3 **RESPONSE TO REQUEST NO. 3:**

4 Responding Party objects that this request fails to describe the requested documents with
5 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects that this
6 request is overbroad, including as to time, and outside the scope of discovery permitted by Rule
7 26(b)(1) to the extent it is not limited to complaints alleging interference with a demonstrator's
8 First Amendment rights or to defendant Dep. Joshua Mayfield. Responding Party objects that this
9 request violates California Penal Code Section 832.5, Penal Code Section 832.7, Evidence Code
10 Section 1043, and Gov. Code Section 7927.700. Party objects to this request to the extent it calls
11 for information or documents protected by the attorney-client privilege and work product
12 doctrine.

13 **REQUEST FOR PRODUCTION NO. 4:**

14 Produce all documents related to any correspondence or discussion(s) YOU had with
15 HARD or HARD representatives during the one-year period preceding the 2022 Events related to
16 FIRST AMENDMENT RIGHTS, the Free Speech Area, and/or demonstrators.

17 **RESPONSE TO REQUEST NO. 4:**

18 Responding Party objects that this request fails to describe the requested documents with
19 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to this request
20 to the extent it calls for information or documents protected by the attorney-client privilege and
21 work product doctrine. Subject to and without waiving said objections, Responding Party
22 responds as follows:

23 After a diligent and reasonable search, Responding Party has not been able to locate any
24 documents regarding communications with HARD about First Amendment rights, the Free
25 Speech Area, and/or the demonstrators within the time period specified, other than the videos
26 previously produced by plaintiffs and Responding Party.

In addition, Responding Party also identifies and produces transcripts of the videos previously produced by Responding Party and by plaintiffs, Bates-stamped AlamedaCounty_Bolbol_000342 through AlamedaCounty_Bolbol_000396.

REQUEST FOR PRODUCTION NO. 5:

Produce all documents related to any correspondence or discussion(s) YOU had with Rowell Ranch Rodeo, Inc. representatives during the one-year period preceding the 2022 Events about FIRST AMENDMENT RIGHTS, the Free Speech Area, and demonstrators.

RESPONSE TO REQUEST NO. 5:

Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

Responding Party identifies the bodycam videos and cell phone videos previously produced by Responding Party and by plaintiffs in this case;

Responding Party identifies and produces transcripts of the videos previously produced by Responding Party and by plaintiffs, Bates-stamped AlamedaCounty_Bolbol_342 through AlamedaCounty_Bolbol_000396.

Responding Party identifies a document entitled “Event Register,” Bates-stamped AlamedaCounty_Bolbol_000278, previously produced to the parties on December 20, 2023; and

Responding Party identifies an audio recording from the Sheriff’s Office, dated May 20, 2022, containing a recording of a telephone call between Gary Houts and Sheriff’s Office Emergency Dispatch Services Operator Melissa McMaster, previously produced to the parties on December 21, 2023.

REQUEST FOR PRODUCTION NO. 6:

Produce any documents relating to communications about or concerning Plaintiffs between YOU and HARD during the 2022 Events, including, but not limited to, the content of the

1 telephone call(s) made to the Sheriff's Office on May 20, 2022, regarding Plaintiffs, as referenced
2 in paragraph 41 of the Complaint.

3 **RESPONSE TO REQUEST NO. 6:**

4 Responding Party objects to this request to the extent it calls for information or documents
5 protected by the attorney-client privilege and work product doctrine. Subject to and without
6 waiving said objections, Responding Party responds as follows:

7 Other than the bodycam videos and cell phone videos previously produced in this case,
8 after a diligent and reasonable search, Responding Party has not been able to locate any
9 nonprivileged documents responsive to this request, other than the videos previously produced by
10 plaintiffs and Responding Party.

11 In addition, Responding Party also identifies and produces transcripts of the videos
12 previously produced by Responding Party and by plaintiffs, Bates-stamped
13 AlamedaCounty_Bolbol_000342 through AlamedaCounty_Bolbol_000396.

14 **REQUEST FOR PRODUCTION NO. 7:**

15 Produce all documents, including, but not limited to, any correspondence, related to any
16 policies, rules, agreements, and/or instructions regarding FIRST AMENDMENT RIGHTS, the
17 Free Speech Area, and/or demonstrators.

18 **RESPONSE TO REQUEST NO. 7:**

19 Responding Party objects that this request fails to describe the requested documents with
20 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects that this
21 request is overbroad and unduly burdensome to the extent it requires the County of Alameda to
22 undertake a County-wide search for responsive information and documents and is outside the
23 scope of discovery permitted by Rule 26(b)(1) to the extent it is not limited to the Alameda
24 County Sheriff's Office and the Rowell Ranch Rodeo and is unlimited as to time. Responding
25 Party accordingly limits its response to Alameda County Sheriff's Office, to demonstrations at the
26 Rowell Ranch Rodeo, and from 2018 to the present. Responding Party objects to this request to
27

1 the extent it calls for information or documents protected by the attorney-client privilege and
 2 work product doctrine. Subject to and without waiving said objections, Responding Party
 3 responds as follows:

4 The Alameda County Sheriff's Office provides its recruits with training and instruction in
 5 First Amendment issues as part of their Academy program. Training in First Amendment issues is
 6 also provided to deputies and sergeants during their one day annual training in October of each
 7 year, and members of the Crowd Management Team also receive training that may at times
 8 address free speech issues.

9 Responding Party identifies the following documents responsive to this request from the
 10 Academy program, Bates-stamped AlamedaCounty_Bolbol_000001-
 11 AlamedaCounty_Bolbol_000277.

12 In addition, Responding Party identifies and produces the following documents:

13 • Training Bulletin No. 13-13, "Peaceful Picketing During Labor Disputes," dated
 14 June 19, 2013; and Training Bulletin No. 15-10, "Filing of Law Enforcement by the Public,"
 15 dated June 26, 2015. These two documents are Bates-stamped AlamedaCounty_Bolbol_000316
 16 through AlamedaCounty_Bolbol_000320.

17 • A set of Powerpoint slides used by Det. Patrick Smyth of the Alameda County
 18 Sheriff's Office for his course for Learning Domain 2, The Criminal Justice System, Bates-
 19 stamped AlamedaCounty_Bolbol_000321 through AlamedaCounty_Bolbol_000341.

20 **REQUEST FOR PRODUCTION NO. 8:**

21 Produce any documents relating to communications about or concerning Plaintiffs
 22 between YOU and Rowell Ranch Rodeo, Inc. representatives during the 2022 Events.

23 **RESPONSE TO REQUEST NO. 8:**

24 Responding Party objects to this request to the extent it calls for information or documents
 25 protected by the attorney-client privilege and work product doctrine. Subject to and without
 26 waiving said objections, Responding Party responds as follows:

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1 Responding Party identifies the bodycam videos and cell phone videos previously
2 produced by Responding Party and by plaintiffs in this case;

3 Responding Party identifies and produces transcripts of the videos previously produced by
4 Responding Party and by plaintiffs, Bates-stamped AlamedaCounty_Bolbol_000342 through
5 AlamedaCounty_Bolbol_000396.

6 Responding Party identifies a document entitled “Event Register,” Bates-stamped
7 AlamedaCounty_Bolbol_000278, previously produced to the parties on December 20, 2023; and

8 Responding Party identifies an audio recording from the Sheriff’s Office, dated May 20,
9 2022, containing a recording of a telephone call between Gary Houts and Sheriff’s Office
10 Emergency Dispatch Services Operator Melissa McMaster, previously produced to the parties on
11 December 21, 2023.

12 **REQUEST FOR PRODUCTION NO. 9:**

13 Produce any documents related to DEMONSTRATORS at Rowell Ranch Rodeo, Inc.
14 events for the years 2018 through 2023.

15 **RESPONSE TO REQUEST NO. 9:**

16 Responding Party objects that this request fails to describe the requested documents with
17 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects that this
18 request is overbroad in scope and as to time, and is unduly burdensome to the extent it requires
19 the County of Alameda to undertake a County-wide search for responsive information and
20 documents and is overbroad as to time. Responding Party accordingly limits its response to
21 Alameda County Sheriff’s Office. Responding Party objects to the extent that this request violates
22 the privacy rights of third parties. Responding Party objects to this request to the extent it calls for
23 information or documents protected by the attorney-client privilege and work product doctrine.

24 Subject to and without waiving said objections, Responding Party responds as follows:

25 Responding Party identifies the documents and videos previously produced by the parties
26 in this action.

REQUEST FOR PRODUCTION NO. 10:

Produce all documents, including but not limited to body cam videos taken at the Rowell Ranch Rodeo Park during the 2022 Events, including but not limited to videos taken by YOU and Alameda County Sheriff's Department Deputy Sheriff Matthew Laszuk, Alameda County Sheriff's Department Deputy Sheriff Christian Campbell, and Alameda County Sheriff's Department Deputy Sheriff Sowmya Ramadas as identified in your Federal Rule of Civil Procedure 26(a)(2) Initial Disclosures.

RESPONSE TO REQUEST NO. 10:

Responding Party objects that this request is vague and ambiguous as the term "All documents" is not further modified other than "including but not limited to...." Responding Party interprets this request to call for all documents, including body cam videos, identified in its Initial Disclosures. Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

Responding Party identifies the bodycam videos and cell phone videos previously produced by Responding Party and by plaintiffs in this case;

Responding Party also identifies and produces transcripts of the videos previously produced by plaintiffs and by Responding Party, Bates-stamped AlamedaCounty_Bolbol_000342 through AlamedaCounty_Bolbol_000396.

REQUEST FOR PRODUCTION NO. 11:

Produce all documents that relate to animal rights demonstrations or Free Speech at the Rowell Ranch Rodeo in possession of Alameda County or considered by the Alameda County Board of Supervisors, including Board meeting agenda and minutes.

RESPONSE TO REQUEST NO. 11:

Responding Party objects that this request fails to describe the requested documents with reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects that this

request is overbroad in scope and as to time, and unduly burdensome to the extent it requires the County of Alameda to undertake a County-wide search for responsive information and documents, is overbroad and unduly burdensome as to time and scope, and outside the scope of discovery permitted by Rule 26(b)(1) to the extent it is not limited to the Alameda County Sheriff's Office and to the extent it goes beyond the demonstrations on May 20, 2022.

Responding Party accordingly limits its response to Alameda County Sheriff's Office and the Board of Supervisors, to the Board of Supervisors open meetings and related agendas and minutes, and from 2018 to the present. Responding Party objects to this request to the extent it calls for information or documents protected by the deliberative process privilege, the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

The Agenda and Minutes of the Alameda County Board of Supervisors' meetings may be accessed using the link below:

<https://bos.acgov.org/broadcast/>

A search page using key words is available at the link below:

<https://agendadocsearch.acgov.org/>

REQUEST FOR PRODUCTION NO. 12:

Produce all documents, including but not limited to video recordings, regarding demonstrators at Rowell Ranch Rodeo Park during the 2022 Events.

RESPONSE TO REQUEST NO. 12:

Responding Party objects that this request fails to describe the requested documents with reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects that this request is overbroad and unduly burdensome to the extent it requires the County of Alameda to undertake a County-wide search for responsive information and documents. Responding Party objects that this request is duplicative of the foregoing requests. Responding Party objects to the extent that this request violates the privacy rights of third parties. Pursuant to an agreement with

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1 plaintiffs' counsel, Responding Party accordingly limits its response to Alameda County Sheriff's
 2 Office. Responding Party objects to this request to the extent it calls for information or documents
 3 protected by the attorney-client privilege and work product doctrine. Subject to and without
 4 waiving said objections, Responding Party responds as follows:

5 Responding Party identifies plaintiffs' Claims against the County of Alameda regarding
 6 the demonstration at the 2022 Rowell Ranch Rodeo.

7 Responding Party identifies the bodycam videos and cell phone videos previously
 8 produced by Responding Party and by plaintiffs Party in this case.

9 Responding Party identifies a document entitled "Event Register," Bates-stamped
 10 AlamedaCounty_Bolbol_000278, previously produced to the parties on December 20, 2023.

11 Responding Party identifies an audio recording from the Sheriff's Office, dated May 20,
 12 2022, previously produced to the parties on December 21, 2023.

13 Responding Party also identifies and produces transcripts of the videos previously
 14 produced by plaintiffs and by Responding Party, Bates-stamped AlamedaCounty_Bolbol_000342
 15 through AlamedaCounty_Bolbol_000396.

16 **RESPONSE TO PLAINTIFFS' REQUEST FOR PRODUCTION, SET TWO**
 17 **REQUEST FOR PRODUCTION NO. 13:**

18 Produce all DOCUMENTS, including but not limited to dispatch records, plans, internal
 19 communications, emails, and/or overtime billing statements that mention or are related to the
 20 assignment, dispatch, presence, or request for sheriff deputies or County law enforcement staffing
 21 at the Rowell Ranch Rodeo Park for the 2022 Events.

22 **RESPONSE TO REQUEST NO. 13:**

23 Responding Party objects that this request is vague and ambiguous as the term "plans."
 24 Responding Party objects that this request fails to describe the requested documents with
 25 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to the extent
 26 that this request violates the privacy rights of third parties. Responding Party objects to this

1 request to the extent it violates Penal Code § 832.7 and Evid. Code §§ 1043 and 1045.

2 Responding Party objects to this request to the extent it calls for information or documents
3 protected by the attorney-client privilege and work product doctrine. Subject to and without
4 waiving said objections, Responding Party responds as follows:

5 Responding Party identifies previously produced documents Bates-stamped
6 AlamedaCounty_Bolbol_000279 through AlamedaCounty_Bolbol_000315.

7 **REQUEST FOR PRODUCTION NO. 13:**

8 Produce all COMMUNICATIONS related to the assignment, dispatch, presence, or
9 request for sheriff deputies or staffing at the Rowell Ranch Rodeo Park for the 2022 Events.

10 **RESPONSE TO REQUEST NO. 14:**

11 Responding Party objects that this request fails to describe the requested documents with
12 reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to the extent
13 that this request violates the privacy rights of third parties. Responding Party objects to this
14 request to the extent it violates Penal Code § 832.7 and Evid. Code §§ 1043 and 1045.

15 Responding Party objects to this request to the extent it calls for information or documents
16 protected by the attorney-client privilege and work product doctrine. Subject to and without
17 waiving said objections, Responding Party responds as follows:

18 Responding Party identifies and produces documents Bates-stamped
19 AlamedaCounty_Bolbol_000279 through AlamedaCounty_Bolbol_000315.

20 **REQUEST FOR PRODUCTION NO. 14:**

21 Produce all DOCUMENTS that include the identification of all County personnel
22 involved in the determination, assignment, oversight, management, and/or participation of any
23 sheriff presence at the Rowell Ranch Rodeo Park for the 2022 Events.

24 **RESPONSE TO REQUEST NO. 15:**

25 Responding Party objects that this request is vague and ambiguous as the terms
26 “determination.” Responding Party objects that this request fails to describe the requested

documents with reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to the extent that this request violates the privacy rights of third parties. Responding Party objects to this request to the extent it violates Penal Code § 832.7 and Evid. Code §§ 1043 and 1045. Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

Responding Party identifies previously produced documents Bates-stamped AlamedaCounty_Bolbol_000279 through AlamedaCounty_Bolbol_000315.

REQUEST FOR PRODUCTION NO. 15:

Produce all DOCUMENTS related to Deputy Mayfield being asked to “put together a team to provide the usual law enforcement presence at the annual rodeo” drafted, exchanged, transmitted, sent, and/or received regarding the 2022 Events. Please see the attached correspondence from County Counsel Marc Brainich containing this quotation.

RESPONSE TO REQUEST NO. 16:

Responding Party objects that this request is vague and ambiguous as the term “put together a team.” Responding Party objects that this request fails to describe the requested documents with reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to this request to the extent it violates Penal Code § 832.7 and Evid. Code §§ 1043 and 1045. Responding Party objects to the extent that this request violates the privacy rights of third parties. Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

Responding Party identifies and produces documents Bates-stamped AlamedaCounty_Bolbol_000279 through AlamedaCounty_Bolbol_000315.

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REQUEST FOR PRODUCTION NO. 16:

Produce all COMMUNICATIONS related to Deputy Mayfield being asked to “put together a team to provide the usual law enforcement presence at the annual rodeo” exchanged, transmitted, sent, or received regarding the 2022 Events. Please see the attached correspondence from County Counsel Marc Brainich containing this quotation.

RESPONSE TO REQUEST NO. 17:

Responding Party objects that this request is vague and ambiguous as the term “put together a team.” Responding Party objects that this request fails to describe the requested documents with reasonable particularity as required by Rule 34(b)(1)(A). Responding Party objects to the extent that this request violates the privacy rights of third parties. Responding Party objects to this request to the extent it violates Penal Code § 832.7 and Evid. Code §§ 1043 and 1045. Responding Party objects to this request to the extent it calls for information or documents protected by the attorney-client privilege and work product doctrine. Subject to and without waiving said objections, Responding Party responds as follows:

Responding Party identifies and produces documents Bates-stamped AlamedaCounty_Bolbol_000279 through AlamedaCounty_Bolbol_000315.

Dated: March 15, 2023

FENNEMORE WENDEL

By: 

William B. Rowell
Thiele R. Dunaway
Marc Brainich
Michele C. Kirrane
Attorneys for Defendants
County of Alameda and Alameda County
Deputy Sheriff Joshua Mayfield

CERTIFICATE OF SERVICE

Joseph P. CuvIELLO, et al. v. Rowell Ranch Rodeo, Inc., et al.
USDC – Northern District of California, Case No. 3:23-cv-01652-VC

I am a citizen of the United States and employed in County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1111 Broadway, 24th Floor, Oakland, California 94607.

On March 15, 2024, I served true copies of the following document(s) described as **DEFENDANT COUNTY OF ALAMEDA’S UPDATED RESPONSE TO PLAINTIFFS’ REQUEST FOR PRODUCTION OF DOCUMENTS, SETS ONE AND TWO** on the interested parties in this action as follows:

Please see attached Service List.

BY EMAIL OR ELECTRONIC TRANSMISSION: By causing the document(s) listed above to be sent to the person at the e-mail addresses listed below. I did not receive, within a reasonable time after transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 15, 2024, at Oakland, California.



Lena S. Mason

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DEFENDANT COUNTY OF ALAMEDA’S UPDATED
RESPONSE TO PLAINTIFFS’ REQUEST FOR
PRODUCTION OF DOCUMENTS, SETS ONE AND
TWO

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SERVICE LIST

Joseph P. CuvIELlo, et al. v. Rowell Ranch Rodeo, Inc., et al.
USDC – Northern District of California, Case No. 3:23-cv-01652-VC

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DEFENDANT COUNTY OF ALAMEDA'S UPDATED
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